

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

In re:	§	Chapter 11
	§	
Double Play Oil & Gas, Inc.	§	Case No. 25-20130
Debtor	§	
	§	

**EMERGENCY MOTION FOR USE OF CASH COLLATERAL**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

Represented parties should act through their attorney

Emergency relief has been requested. If the Court considers the motion on an emergency basis, then you will have less than 21 days to answer. If you object to the requested relief or if you believe that the emergency consideration is not warranted, you should file an immediate response..

COMES NOW Double Play Oil & Gas, Inc., Debtor herein, and files this Emergency Motion for Use of Cash Collateral, and in support thereof would show the following:

1. By this Motion, the Debtor seeks interim and final relief allowing it to use cash collateral in the continuing operation of its business.

**JURISDICTION AND PROCEDURAL BACKGROUND**

2. On May 5, 2025, (the “Petition Date”), Debtor filed a voluntary petition for relief under subchapter V of chapter 11 (the “Bankruptcy Code”) in the United States Bankruptcy Court

for the Southern District of Texas, Corpus Christi Division (“Court”), thereby commencing this chapter 11 case (“Case”). Debtor continues in possession of its property and it is operating and managing its business as a debtor in possession pursuant to the provisions of 11 U.S.C. §§ 1107(a) and 1108.

3. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1334 and 157. This Motion is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A). Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The basis for the relief herein is primarily grounded in 11 U.S.C. §363.

### **Overview**

5. The Debtor is a small oil and gas operator with properties in Bee, DeWitt, Duval, Goliad, Jim Wells, Karnes, Lavaca, Live Oak, Nueces and Victoria Counties. Its bankruptcy proceeding was precipitated by foreclosure proceedings initiated by Freedom Bank.

### **Creditors with a Possible Interest in Cash Collateral**

6. Debtor’s counsel has reviewed the UCC financing statements on file with the Texas Secretary of State. Numerous liens appear of record. Debtor has not included lapsed or terminated financing statements on this summary. Debtor has not reviewed the real estate records in every county but is aware that Freedom Bank has filed Deeds of Trust in multiple counties.

Date	Creditor	Amount	Collateral
5/20/2019	Freedom Bank	\$283,000.00	Deeds of Trust
5/23/2020	US Small Business Administration	\$49,182.00	Blanket lien on personal property assets
06/10/2020	Corporation Service Company as Representative	Unknown	Future Receipts
9/22/2020	RDM Capital Funding, LLC	\$0	All assets

1/26/2023	Corporation Service Company as Representative	Unknown	All personal property
4/7/2023	CT Corporation System as Representative	Unknown	All personal property

7. Certain creditors have chosen to file their UCC-1 financing statements using CT Corporation Service, as representative of Corporation Service Company, as representative. Usually, this is done by Merchant Cash Advance lenders. The Debtor is aware of the following secured creditors on its books and records who are not otherwise accounted for above which are likely the underlying creditors for the anonymous lienholders:

Blue Grass Lending Group	\$105,827.50
On Deck	\$77,456.00

8. The Debtor has several types of assets. It holds interests in oil and gas wells which are real estate under Texas law. Freedom Bank appears to be the only creditor with a deed of trust interest.

#### **Debtor's Preliminary Monthly Budget and Expenses**

9. The Debtor's proposed budget for the next month is attached hereto as Exhibit A. Debtor proposes to pay its usual and customary operating expenses. The Debtor's budget reflects income of \$16,000.00 per month and expenses of \$18,797.11. As a result, Debtor will not be able to pay all of the expenses on the budget. Debtor will give priority to the expenses which directly affect the operation of the oil and gas wells, such as field electricity, fuel and lube for pumping units, field contract labor and supervision and liability insurance.

#### **NECESSITY FOR REQUESTED RELIEF**

10. Debtor generates Cash Collateral from the operation of its business when it produces oil and gas and sells its products.

11. Debtor can meet its ongoing post-petition obligations only if it borrows funds post-petition or obtains authority for use of Cash Collateral. The Debtor seeks to fund its operations from use of cash collateral

**ARGUMENTS AND AUTHORITIES IN SUPPORT OF REQUEST  
FOR TEMPORARY AND FINAL USE OF CASH COLLATERAL**

12. Debtor requires immediate authority from the Court to use the Cash Collateral in the ordinary course of its business on an interim basis until there is a final hearing on this Motion as well as to borrow funds for its operations.

13. Debtor requests the authority to use cash collateral to operate its business.

14. Under 11 U.S.C. §363(c)(2), the Debtor may not use, sell, or lease the Cash Collateral without the Court's authority or consent. Section 363(e) allows the Court to grant this authority upon the provision of adequate protection to the secured parties.

15. Debtor requires the continued authority to use Cash Collateral beyond the interim period in order to continue its business until a plan of reorganization can be confirmed. Debtor's need to use the Cash Collateral will continue during the pendency of this bankruptcy case.

16. Debtor also requests that this Court schedule a hearing for final approval on the use of Cash Collateral, on notice to creditors and parties in interest, in the event an objection is filed to the terms of the interim order.

17. The immediate and temporary approval for the use of the Cash Collateral is consistent with (i) Bankruptcy Code requirements for maintaining the going concern of a debtor's business operations; (ii) the law under 11 U.S.C. §§ 363 and 361 as to the use of cash collateral and adequate protection; and (iii) facilitating a successful reorganization under chapter 11 of the

Bankruptcy Code.

18. The failure to authorize the immediate use of Cash Collateral on which the secured parties hold liens will result in a swift and significant deterioration of Debtor's business. Failure to gain authority to use, sell, or lease such collateral will result in a cessation of Debtor's business activities.

19. The Bankruptcy Code contemplates a debtor's use of collateral during the reorganization of its business. Sections 102(1) and 363 of the Bankruptcy Code provide that collateral may be used upon notice and opportunity for a hearing appropriate in the particular circumstances. Relief may be authorized without an actual hearing if there is insufficient time available and adequate protection has been provided. 11 U.S.C. § 363(e). The combination of Debtor's emergency needs to satisfy pending obligations and current operating needs, together with the provision of adequate protection are sufficient to authorize the interim use of the collateral as set forth herein.

20. Section 361 of the Bankruptcy Code sets forth various types of adequate protection which Debtor may provide:

- a. making periodic cash payments to the extent that the creditor suffers a decrease in the value of its interest in such property;
- b. granting replacement liens in collateral to compensate the creditor for any decrease in the value of the creditor's interest in such property; or
- c. granting other relief as will result in the realization of the indubitable equivalent of the creditor's interest in collateral.

Additionally, the presence of an equity cushion may be sufficient to provide adequate protection.

21. Debtor proposes to provide adequate protection to the parties with an interest in cash collateral in the following manner.

a. The Debtor shall provide all creditors with an interest in cash collateral with a replacement lien upon assets obtained post-petition to the same extent, priority and validity as their pre-petition liens.

b. Debtor will maintain insurance upon its assets.

WHEREFORE, Debtor requests that the Court authorize the use, sale, or lease of Cash Collateral on an interim basis and, upon setting and conducting a final hearing, issue a final order authorizing the use, sale, or lease of such cash collateral with the adequate protection to the secured parties as set forth herein; and grant any other and further relief to which Debtor is entitled.

Dated: May 5, 2025

Respectfully Submitted,

**BARRON & NEWBURGER, P.C.**

7320 N. Mopac Expy, Suite 400

Austin, Texas 78731

(512) 649-3243

/s/ Stephen Sather

Stephen Sather

State Bar No 17657520

*Proposed Counsel for Debtor*

### **CERTIFICATE OF SERVICE**

I certify that, on May 5, 2025, a copy of the foregoing Motion was served by first class mail, postage prepaid and properly addressed, or by the Court's CM/ECF noticing system to all parties registered to receive such notice, served on all parties listed on the attached Service List and by email to:

[Daniel.hu@usdoj.gov](mailto:Daniel.hu@usdoj.gov)

[jcummings@atlashall.com](mailto:jcumplings@atlashall.com)

/s/ Stephen Sather

Stephen Sather

Label Matrix for local noticing  
0541-2  
Case 25-20130  
Southern District of Texas  
Corpus Christi  
Mon May 5 17:38:22 CDT 2025

2W Services  
PO Box 1028  
Goliad, TX 77963-1028

AJ Logistics  
PO Box 3171  
Alice, TX 78333-3171

Air Equipment  
406 S. Navigation  
Corpus Christi, TX 78405-4001

Analysis Laboratories  
3512 Montopolis Dr  
Austin, TX 78744-1418

Buesing Contract  
PO Box 12  
Yorktown, TX 78164-0012

CUDD Energy Services  
PO Box 203379  
Dallas, TX 75320-3379

Cimarron Engineering  
PO Box 1536  
Kingsville, TX 78364-1536

Cody Smith  
P.O. Box 1071  
Hebbronville, TX 78361-1071

Cortes Lease Service  
PO Box 23  
Ganado, TX 77962-0023

Double Play Oil & Gas, Inc  
PO Box 520  
Portland, TX 78374-0520

3J Services  
434 Gentry Rd  
Inez, TX 77968-3340

Action Oilfield Constr  
507 W York St.  
Ganado, TX 77962-8425

Alamo Tubing Testers  
Po Box 2087  
Alvin, TX 77512-2087

Black Gold Surveying  
PO Box 3416  
Alice, TX 78333-3416

Buesing Prod Service  
PO Box 12  
Yorktown, TX 78164-0012

Carolyn DeCamp  
P.O. Box 592210  
San Antonio, TX 78259-0160

Coastal Bend Wellhead  
4841 Santa Elena  
Corpus Christi, TX 78405-3621

Conard Saltwater  
400 County RD 152  
George West, TX 78022-3410

Croft  
19230 FM 442 Road  
Needville, TX 77461-5709

2  
United States Bankruptcy Court  
1133 North Shoreline Blvd #208  
Corpus Christi, TX 78401-2042

4K Resources  
118 Crawford Dr.  
Victoria, TX 77904-9604

Advanced Hydrostatic  
4900 Texoma Pkwy  
Sherman, TX 75090-2059

American Ad Valorem  
PO Box 6330  
Corpus Christi, TX 78466-6330

Blue Grass Lending Group  
Po Box 919  
Pewee Valley, KY 40056-0919

COT Oil Tool  
P.O. Box 1619  
Giddings, TX 78942-1479

Chemical Conditioning  
P.O. Box 41  
Hallettsville, TX 77964-0041

Coastal Quick Rent, LLC  
604 Osage St.  
Refugio, TX 78377-3229

Continental Pump  
1013 Hunters Circle  
Victoria, TX 77905-3969

DS oilfield Construction  
P.O. Box 3368  
Alice, TX 78333-3368

Day County Services  
183922 E CO Rd. 60  
Arnett, OK 73832-1780

Diaz Welding  
13042 County Road 1296  
Sinton, TX 78387-5427

Dinosaur Oilfield Services  
421 Taos Dr  
Victoria, TX 77904-3777

Discount Oilfield Equipment  
PO Box 520  
Portland, TX 78374-0520

EG III Trucking LLC  
Po Box 732951  
Dallas, TX 75373-2951

Energy Fishing  
PO Box 732951  
Dallas, TX 75373-2951

Fitzpatrick  
P.O. Box 1149  
El Campo, TX 77437-1149

Force Trucking  
4841 Santa Elena  
Corpus Christi, TX 78405-3621

Freedom Bank  
533 N Alamo Rd  
Alamo, TX 78516-2307

G&N Construction  
Po Box 2360  
Abilene, TX 79604-2360

GM Compressor  
Alice, TX 78333

Galbraith  
6659 C R 1432  
Aransas Pass, TX 78336

Genco Energy Services  
P.O. Box 720130  
McAllen, TX 78504-0130

Great American Financial Svcs  
Po Box 660831  
Dallas, TX 75266-0831

Gulf Coast Lease Service  
PO Box 1541  
McAllen, TX 78505-1541

H & K Well Service  
P.O. Box 1778  
Freer, TX 78357-1778

Hefte  
13434 Leopard St #A29B  
Corpus Christi, TX 78410-4466

J B hunt Contracting  
940 Live Oak Dr.  
Inez, TX 77968-3642

Jack Cowley Supply  
P.O. Box 3546  
Alice, TX 78333-3546

Jean Shaw  
6427 FM 442  
Boling, TX 77420-9821

Jose Rodriguez Trucking  
502 CR 238  
Ganado, TX 77962-8509

Joy Pearson  
1710 Palm Valley Dr. W  
Harlingen, TX 78552-8955

K & R Operating  
P.O. Box 4985  
Houston, TX 77210-4985

Kent Chopelas  
220 E San Patricio Ave.  
Mathis, TX 78368-2348

L.O. Construction  
PO Box 810  
Premont, TX 78375-0810

Lagarto Rentals Tools  
PO Box 2100  
Alice, TX 78333-2100

Lone Star Industries  
P.O. Box 188  
Hebbbronville, TX 78361-0188

Lynn Shipp  
P.O. Box 715  
Sandia, TX 78383

MAK Land Services  
615 Leopard St.  
Corpus Christi, TX 78401-7801

Martin Water Well  
2151 N Hwy 77  
Robstown, TX 78380



Mesa Southern  
P.O. Box 458  
Houston, TX 77001-0458

Midco Supply  
P.O. Box 349  
Ganado, TX 77962-0349

Moncla Workover  
P.O. Box 5935, Drawer #2351  
Troy, MI 48007-5935

Montez Electric  
Po Box 1310  
Alice, TX 78333-1310

Moulton Oilfield Service  
P.O. Box 4086  
Alice, TX 78333-4086

Newman Operating  
Po Box 448  
Freer, TX 78357-0448

OK Lease Service  
Po Box 1092  
Beeville, TX 78104-1092

Oilfield Compression  
2107 Benbow Rd  
Inez, TX 77968-3319

On Deck  
4700 W Daybreak Pkwy Ste 200  
South Jordan, UT 84009-5133

Paloma Lease Service  
Po Box 1116  
George West, TX 78022-1116

Petroleum Prod Svc  
Po Box 4238  
Alice, TX 78333-4238

Pipeline Measurement  
Po Box 193  
Agua Dulce, TX 78330-0193

Pitney Bowes  
PO Box 981022  
Boston, MA 02298-1022

Production Equipment  
Po Box 2621  
Corp Christi, TX 78403-2621

RPM Swabbing Services  
Po Box 3106  
Victoria, TX 77903-3106

Ram Gear  
6150 E Highway 44  
Alice, TX 78332-7384

Richard Deal  
P.O. Box 1170  
Yorktown, TX 78164-1170

Rockin B  
Po Box 1167  
Kingsville, TX 78364-1167

S&D Vacuum  
710 Buffalo St Ste 802  
Corp Christi, TX 78401-1902

SPN Well Service  
Po Box 201934  
Dallas, TX 75320-1934

Saenz Construction  
Po Box 1348  
George West, TX 78022-1348

Sam J. Wostal Estate  
2732 County Road 476  
Centerville, TX 75833-1844

Samson Pump & Supply  
Po Box 3466  
Alice, TX 78333-3466

Sidney Otahal  
4310 Pecan Bayou Ct  
Corp Christi, TX 78410-5617

Skilled Oilfield  
Po Box 963  
Sinton, TX 78387-0963

Small Business Administration  
2120 Riverfront Drive Suite 100  
Little Rock, AR 72202-1794

South Coast Oilfield Service  
Po Box 520  
Portland, TX 78374-0520

(p)SOUTHPOINT RENTALS LLC  
PO BOX 511  
KINGSVILLE TX 78364-0511

South Texas Pump & Supply  
Po Box 864  
Freer, TX 78357-0864

Southern Supply  
Po Box 300  
Freer, TX 78357-0300

Stagecoach Way Reserves  
625 Moray Pl  
Corp Christi, TX 78411-1915

Tare Resources  
P.O. Box 260784  
Corpus Christi, TX 78426-0784

Texas Cementing  
2620 E Corral Ave  
Kingsville, TX 78363-4102

Texas Downhole Tools  
164 Leeper Ln  
Victoria, TX 77904-4917

Texas Industrial  
Po Box 590  
George West, TX 78022-0590

Tierra Lease  
Po Box 366  
Kenedy, TX 78119-0366

US Trustee  
615 E. Houston Street  
Suite 533  
San Antonio, TX 78205-2055

United States Attorney General  
Department of Justice  
950 Pennsylvania Ave Nw  
Washington, DC 20530-0009

United States Department of Justice  
US Attorney, Civil Process Clerk  
601 N. W. Loop 410, Suite 600  
San Antonio, TX 78216-5597

War Horse Fishing  
PO Box 1171  
Alice, TX 78333-1171

Water Energy Services  
Po Box 4738  
Houston, TX 77210-4738

Stephen Wayne Sather  
Barron Newburger, P.C.  
7320 N Mopac Expy  
Ste 400  
Austin, TX 78731-2347

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

South Point Rentals  
Po Box 511  
Kingsville, TX 78364-0511

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Flawless Welding

End of Label Matrix	
Mailable recipients	101
Bypassed recipients	1
Total	102

*DOUBLE PLAY OIL & GAS, INC*  
*P O BOX 520*  
*PORTLAND TX 78374*  
*(361)643-6041*  
*FAX (361)643-5041*

**Double Play Oil & Gas, Inc.**  
**Monthly Budget Proposal**  
**Period: May 2025**

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**Purpose:**

This budget outlines the projected expenses for Double Play Oil & Gas, Inc. for the upcoming month. The proposed allocation ensures continuity of office operations, field services, and administrative functions essential for ongoing business activities and increasing production, value and income.

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**Projected Monthly Expenses**

<b>Category</b>	<b>Amount</b>
Internet	\$83.43
Office Rent	\$4,800.00
Phone Service	\$321.00
Office Electricity	\$339.00
Storage Unit	\$294.00
WolfPak Operating Software	\$822.68
Office Supplies	\$94.00
Field Electricity	\$100.00
Fuel and Lube for Pumping Units	\$160.00
Gaugers	\$900.00
Contract Clerical/Bookkeeping	\$3,500.00
Liability Insurance	\$995.00

<b>Category</b>	<b>Amount</b>
Field Contract Labor and Supervision	\$5,700.00
Postage and Printer	\$689.00

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**Total Projected Monthly Expenses: \$18,797.11**

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**Estimated Income for May will be approximately \$16,000.00**

**Prepared by:**

Glenn Burdine -President

Double Play Oil & Gas, Inc.

May 5, 2025